

Patrick J. Joyce Esq.

Attorney at Law
70 Lafayette Street - 2nd Floor
New York, New York 10013
(212) 285-2299
FAX (212) 513-1989

New Jersey Office:
658 Ridgewood Road
Maplewood, NJ 07040

August 30, 2022

Judge Richard M. Berman
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Wilfredo Rosado.
21 Cr 516 (RMB)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/31/22

Dear Judge Berman,

I represent Wilfredo Rosado in the above captioned matter, pursuant to the Criminal Justice Act. I write to request that the Court authorize the appointment of Robert Moore, (c/v attached) a private practitioner with whom I have worked for many years, to assist me in representing Mr. Rosado in this matter.

This case, which involves charges which carry severe mandatory minimum prison sentences, has produced tremendous amount of discovery. Given my conversations with Mr. Rosado, I whole-heartedly believe that Mr. Rosado will be on trial in this case early next year.

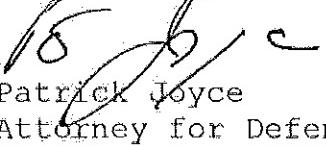
Mr. Moore has assisted me in the past in preparing motions on several cases in this District, he has assisted in research and writing briefs before the Second Circuit and he, himself has argued cases before both the Second Circuit and the New York State Court of Appeals. His work is exemplary and he will be of great assistance. Mr. Moore was associate counsel with me on the trial of USA v. Ernest Murphy, 18 Cr.373 (RJS). He was also assigned as associate counsel in the case of USA v. Falikou Kone, 19 Cr- 808 (VEC), which was just tried last month.

I am highly conscious of needlessly expending CJA funds. Consistent with the goal of conserving resources, I firmly believe that the appointment of Mr. Moore in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher billing rate.

Mr. Moore has assisted me on multiple CJA matters in this district and is very familiar with the mandates and obligations for CJA appointed counsel. When I broached the subject with Mr. Rosado regarding the appointment of Associate Counsel, he was very receptive.

Accordingly, I respectfully request that Your Honor execute the enclosed Proposed Order authorizing the appointment of Mr. Moore at a rate of \$110 per hour.

Respectfully submitted,


Patrick Joyce
Attorney for Defendant Wilfredo Rosado

Cc: All counsel via ecf

<u>Application granted.</u>	
_____ _____ _____ _____	
SO ORDERED: Date: <u>8/31/22</u>	 Richard N. Berman Richard M. Berman, U.S.D.J.